

**AFFIDAVIT OF U.S. SECRET SERVICE SPECIAL AGENT AARON BATES**  
**IN SUPPORT OF A CRIMINAL COMPLAINT**

I, Aaron Bates, declare and state as follows:

**INTRODUCTION**

1. I am a Special Agent with the United States Secret Service (“USSS”) and have been employed as such since April 12, 2021. I have attended the Criminal Investigator Training Program at the Federal Law Enforcement Training Center in Glynco, Georgia, and the USSS Special Agent Training Course at the James J. Rowley Training Center in Beltsville, Maryland. My current duties include the investigation of financial crimes and the protection of the President of the United States, Vice President of the United States, dignitaries afforded protection by statute and federal law, and foreign heads of state when they are visiting the United States.

2. I am currently assigned to the Boston Field Office, New England Cyber Fraud Task Force. I investigate cases involving but not limited to violations of wire fraud (18 U.S.C. § 1343), bank fraud (18 U.S.C. § 1344), attempted bank and wire fraud (18 U.S.C. § 1349), and aggravated identity theft (18 U.S.C. § 1028A). In connection with these investigations, I have conducted or participated in numerous field interviews of suspects and witnesses; performed electronic and physical surveillance; and reviewed bank account documents and other files relating to the wiring of monies between banks. Through my training and experience, I have become familiar with various financial frauds and schemes involving bank fraud, wire fraud, and mail fraud. Furthermore, as a federal agent, I am authorized to execute warrants issued under the authority of the United States.

**PURPOSE OF AFFIDAVIT**

3. I submit this affidavit in support of a criminal complaint charging Archil GRDZELISHVILI, a.k.a. “Archie Longson,” (hereinafter, “GRDZELISHVILI”), DOB

XX/XX/1979, with bank fraud (18 U.S.C. § 1344) and aggravated identity theft (18 U.S.C. § 1028A). The facts stated herein are based on my own personal involvement with this investigation as well as from information provided to me by other law enforcement officers involved in the investigation. Because this affidavit is submitted for the limited purpose of securing a criminal complaint, I have not included every fact known to me concerning this investigation. Instead, I have set forth only the facts that I believe are necessary to establish the necessary foundation for the requested complaint.

### **PROBABLE CAUSE**

#### **I. Overview of Scheme**

4. In March of 2022, I became aware that Webster Bank N.A. (“Webster Bank”), a financial institution insured by the Federal Deposit Insurance Corporation, incurred fraud losses due to an organized fraud ring operating in the New England area, specifically, but not limited to, Connecticut, Massachusetts, and New Hampshire.

5. More specifically, I became aware that the Edward G. Sawyer Company (“E.G. Sawyer”), which is an electrical contracting company that employs approximately 200 people and is located in Weymouth, Massachusetts, was the victim of fraud perpetrated by a then-unknown person, who later was identified as GRDZELISHVILI. As is described in greater depth below, between March 9, 2022, and March 15, 2022, GRDZELISHVILI used a counterfeit Massachusetts license bearing his photograph and the true information of Victim 1 (hereinafter “the fraudulent Victim 1 license”), who is an executive level employee and signer on E.G. Sawyer business accounts,<sup>1</sup> to make eleven transactions, resulting in the withdrawal of \$140,200 from various E.G.

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<sup>1</sup> The identity of Victim 1 is known to investigators but redacted here for the protection of his/her privacy.

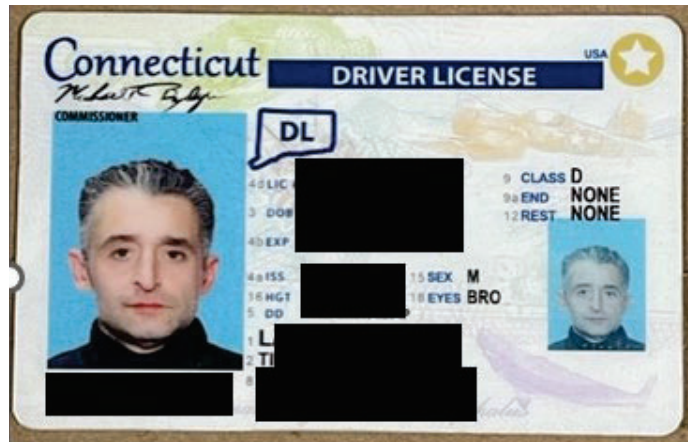
Sawyer business bank accounts located in Massachusetts. GRDZELISHVILI also attempted to wire transfer \$37,000 and withdraw \$9,500 in cash, but he was unsuccessful in each instance. , GRDZELISHVILI also obtained an official check<sup>2</sup> for \$6,000, but was unable to cash it before the fraud was detected and the official check was canceled. A redacted image of the fraudulent Victim 1 license is included below:



6. Additionally, in April of 2022, GRDZELISHVILI used a counterfeit Connecticut license bearing his photograph and the true information of Victim 2 (hereinafter “the fraudulent Victim 2 license”), who owns and operates restaurants in the Connecticut area,<sup>3</sup> to withdraw \$8,000 in cash, obtain an official check for \$12,500.00, and request account documents from Victim 2’s business account at Webster Bank. This activity led to GRDZELISHVILI’s identification and arrest. An image of the fraudulent Victim 2 license is included below:

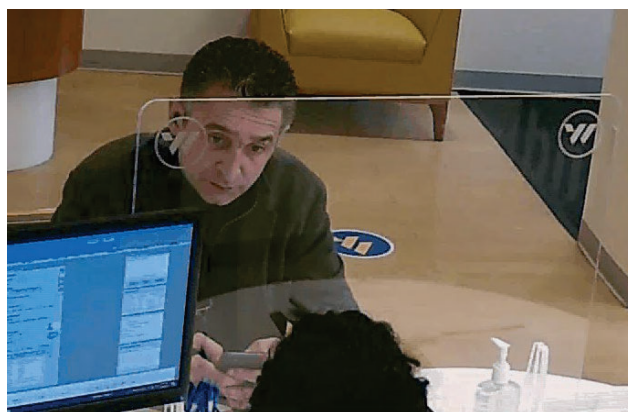
<sup>2</sup> The term “official check” as used by Webster Bank is synonymous with a “Bank Check” or “Cashiers Check.” A Bank Check, Cashiers Check, or as Webster Bank refers to it an “official check” are checks that are guaranteed by the bank, i.e. the bank is responsible for the funds. Banks usually charge a fee to issue an official check.

<sup>3</sup> The identity of Victim 2 is known to investigators but redacted here for the protection of his/her privacy.



## II. GRDZELISHVILI'S Fraudulent Use of Victim 1's Identifying Information

7. On March 9, 2022, at approximately 4:00 PM, at the teller's counter of Webster Bank branch #22 located at 1177 Post Road in Fairfield, Connecticut, GRDZELISHVILI presented the fraudulent Victim 1 license as his identification. He then requested and was provided a copy of the latest bank statements for an E.G. Sawyer business account. GRDZELISHVILI then made two transactions involving Webster Bank account ending in -2177, which is an E.G. Sawyer commercial checking account located in Massachusetts: he withdrew \$4,200.00 in cash, and he obtained official check 249250, made payable to "Archie Longson" for \$14,500.00. This transaction was captured on Webster Bank surveillance video and an image of GRDZELISHVILI conducting it is included below:



8. On March 10, 2022, at approximately 4:30 PM, at the teller's counter of Webster Bank branch #41 located at 375 Bridgeport Avenue in Shelton, Connecticut, GRDZELISHVILI presented the fraudulent Victim 1 license. He then obtained two official checks from an account ending in -1320, which is another E.G. Sawyer commercial checking account located in Massachusetts. Check number 2498241 was made payable to "Archie Longson" in the amount of \$12,000.00, and check number 2498242 was made payable to Armon O. Perry<sup>4</sup> in the amount of \$30,500.00.<sup>5</sup> This transaction was captured on Webster Bank surveillance video and an image of GRDZELISHVILI conducting it is included below:



9. On March 10, 2022, at approximately 5:00 PM, at the teller's counter of Webster Bank branch #73, located at 506 Shelton Avenue in Shelton, Connecticut, GRDZELISHVILI presented the fraudulent Victim 1 license. He then made two transactions involving the E.G. Sawyer account ending in -1320: he withdrew \$8,500 in cash and obtained official check 2404422

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<sup>4</sup> At present, this individual's role is unknown, but based on my training and experience with other similar conspiracies, I believe he is likely a co-conspirator.

<sup>5</sup> The two checks were later cashed at Citizens Bank and JP Morgan Chase, respectively.

made payable to Carl Jamel Madden for \$28,000.00.<sup>6</sup> The check later was deposited at JP Morgan Chase. This transaction was captured on Webster Bank surveillance video and an image of GRDZELISHVILI conducting it is included below:



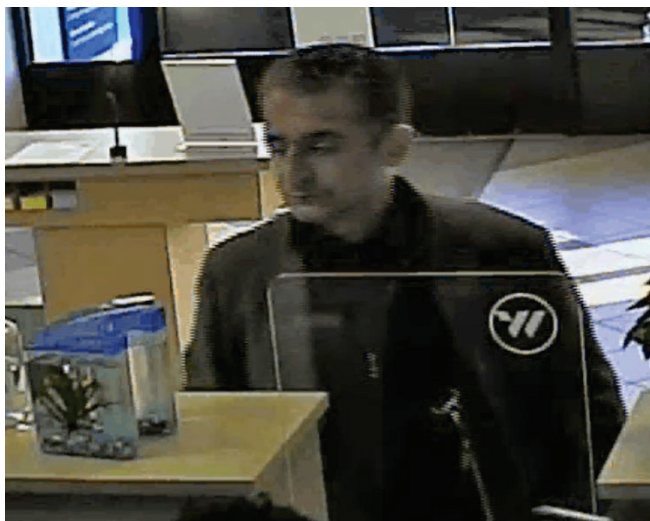
10. On March 11, 2022, at approximately 5:00 PM, at the teller's counter of Webster Bank branch #72, located at 500 New Haven Avenue in Derby, Connecticut, GRDZELISHVILI presented the fraudulent Victim 1 license. He then made two transactions involving E.G. Sawyer account ending in -1320: a cash withdrawal totaling \$6,900 and he obtained official check 2475100, made payable to "Carl Jamel Madden" for \$15,000.00. Official check 2475100 was deposited into a newly established account ending in -6956 at Webster Bank in the name of Carl James Madden. GRDZELISHVILI also obtained official check 211170103 from E.G. Sawyer account ending in -1320 in the amount of \$6,000.00 made payable to Steven A Cipolla<sup>7</sup> but this check was stopped by Webster Bank and no loss was incurred. This transaction was captured on

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<sup>6</sup> At present, this individual's role is unknown, but based on my training and experience with other similar conspiracies, I believe he likely is a co-conspirator.

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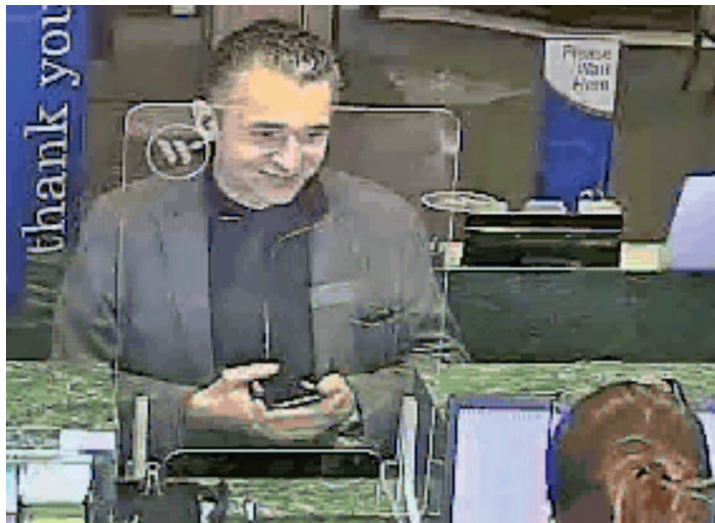
Webster Bank surveillance video and an image of GRDZELISHVILI conducting it is included below:



11. On March 14, 2022, at approximately 12:55 PM, at the teller's counter of Webster Bank branch #72, in Derby, Connecticut, GRDZELISHVILI presented the fraudulent Victim 1 license. He then made a cash withdrawal totaling \$7,500.00 from E.G. Sawyer account ending in -1320. This transaction was captured on Webster Bank surveillance video and an image of GRDZELISHVILI conducting it is included below:



12. On March 15, 2022, at approximately 11:40 AM, at the teller's counter of Webster Bank branch #142, located at 7 Halls Road in Old Lyme, Connecticut, GRDZELISHVILI presented the fraudulent Victim 1 license. He then made a cash withdrawal totaling \$7,500.00 from the E.G. Sawyer account ending in -1320. This transaction was captured on Webster Bank surveillance video and an image of GRDZELISHVILI conducting it is included below:



13. On March 15, 2022, at approximately 1:05 PM, at the teller's counter of Webster Bank branch #72, in Derby, Connecticut, GRDZELISHVILI presented the fraudulent Victim 1 license. He then made a cash withdrawal totaling \$5,600.00 from the E.G. Sawyer account ending in -1320. GRDZELISHVILI also requested to wire transfer \$37,000.00 from the E. G. Sawyer business account ending in -1320 to Wells Fargo NA account ending in -9714, which is an account owned solely by Archie GRDZELISHVILI at an address in New York, New York.<sup>8</sup> That same day, the wire transfer request was reviewed and denied, and this caused the above-described fraudulent withdrawal activity involving the E.G. Sawyer business accounts to be discovered. This

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<sup>8</sup> According to law enforcement databases that aggregate public records, GRDZELISHVILI is associated with the New York address of this account.

transaction was captured on Webster Bank surveillance video and an image of GRDZELISHVILI conducting it is included below:



14. On March 16, 2022, at approximately 5:00 PM, GRDZELISHVILI entered Webster Bank location #200 located at 83 Newtown Road in Danbury, Connecticut. At the teller's counter, GRDZELISHVILI presented the fraudulent Victim 1 license. GRDZELISHVILI presented a withdrawal slip totaling \$9,500 and attempted to make the withdrawal from the E.G. Sawyer account ending in -1320. This transaction was captured on Webster Bank surveillance video and an image of GRDZELISHVILI conducting it is included below:



Bank employees recognized GRDZELISHVILI due to internal bank notifications reporting fraud and contacted local police. GRDZELISHVILI fled from the bank prior to local police's arrival, leaving the fraudulent Victim 1 license behind. This license was taken into custody by the Danbury Police Department ("DPD") and determined to be counterfeit. It remained in DPD custody until I retrieved it on June 9, 2023, since which point it has been secured in my custody.

**III. GRDZELISHVILI'S Fraudulent Use of Victim 2's Identifying Information and His Resultant Arrest**

15. On April 19, 2022, at approximately 4:55 PM, at Webster Bank branch #51, located at 50 Freshwater Boulevard in Enfield, Connecticut, GRDZELISHVILI presented at the teller's counter the fraudulent Victim 2 license. Victim 2 is the signer on a business account ending with -4524 associated with his company, which owns and operates several restaurants in the Connecticut area. GRDZELISHVILI withdrew \$8,000.00 in cash and obtained an official check made payable to Archie GRDZELISHVILI for \$12,500.00. This check was later stopped by Webster Bank and not paid. This transaction was captured on Webster Bank surveillance video and an image of GRDZELISHVILI conducting it is included below:



16. On April 21, 2022, a male called Webster Bank's Needham, Massachusetts banking center and identified himself as Victim 2. The caller indicated that he wanted to make a \$14,000.00 cash withdrawal and asked if the banking center had enough cash on hand. The caller said he would be there at 4:00 PM to make the withdrawal. At approximately 4:00 PM, Archil GRDZELISHVILI went to Webster Bank's Harvard Square banking center located at 1 Brattle Square in Cambridge, Massachusetts. He presented the fraudulent Victim 2 license to a bank teller and requested bank statements for various accounts in Victim 2's name. A Webster Bank employee called the Cambridge Police Department ("CPD") because the employee recognized GRDZELISHVILI from fraud activity notifications that had been distributed internally by Webster Bank. CPD responded to the scene and arrested GRDZELISHVILI. It was through this arrest that GRDZELISHVILI was identified and related to all of the above outlined fraud activity. This transaction was captured on Webster Bank surveillance video and an image of GRDZELISHVILI conducting it is included below:



17. GRDZELISHVILI was arraigned the same day in Cambridge District Court, and did not appear for subsequent scheduled hearings. As a result, a default warrant has been issued through Cambridge District Court. The fraudulent Victim 2 license remains in CPD custody.

**IV. Victim Interviews**

**A. Interview with Victim 1**

18. On Monday, June 16, 2022, I interviewed Victim 1 in person at E.G. Sawyer. The interview was audio recorded. Victim 1 indicated that in or about March of 2022, Victim 1 was notified by Webster Bank of potential fraud activity involving E.G. Sawyer accounts ending in -1320 and -2177. Victim 1 was unfamiliar with the transactions and told Webster Bank that the transactions were fraudulent. Victim 1 then worked with officials from E.G. Sawyer and Webster Bank to conduct a review of these accounts' past transaction histories. As a result of this review, the full scope of the above-described fraud activity was identified.

19. Victim 1 did not recognize GRDZELISHVILI's name. Victim 1 indicated that only he/ and/or another E.G. Sawyer executive would have been able to authorize and or conduct the transactions in question; no other E.G. Sawyer employees would have access to the information that was required to complete transactions of that volume and dollar amount.

20. Victim 1 further stated that on or about March of 2022, E.G. Sawyer was reimbursed \$140,200.00 by Webster Bank. Victim 1 explained that this was not an insurance reimbursement, but rather that Webster Bank chose to reimburse E.G. Sawyer due to the volume of transactions that E.G. Sawyer conducts with Webster Bank and the length of time that E.G. Sawyer has been a Webster Bank customer. Webster Bank confirmed the same and indicated that it suffered a loss of \$140,200.00 in reimbursing E.G. Sawyer.

**B. Interview with Victim 2**

21. On Wednesday, August 3, 2022, I conducted a telephonic interview with Victim 2. Victim 2 explained that on or about April 22, 2022, after GRDZELISHVILI's arrest, Victim 2 was made aware of fraudulent transactions that occurred involving his Webster Bank business checking account ending in -4524. Victim 2 indicated that he does not know GRDZELISHVILI, and did not authorize either the attempted cash withdrawal to take place or the (ultimately stopped) bank check to be issued. Victim 2 explained that he and his wife would have been the only individuals allowed to authorize or conduct these transactions based on their dollar amount. Victim 2 has been reimbursed by Webster Bank for his \$8,000.00 loss.

**CONCLUSION**

22. The aforementioned events at Webster Bank branch locations all were captured by bank's video surveillance systems. I have reviewed that surveillance footage and believe based on the use of the same fraudulent Victim 1 license on multiple instances; the use of the fraudulent Victim 2 license on multiple instances, including the instance after which GRDZELISHVILI was arrested; and GRDZELISHVILI's physical appearance, which matches the photographs on both the fraudulent Victim 1 and 2 licenses; that GRDZELISHVILI was the individual who conducted all of the aforementioned transactions.

23. Based on all of the foregoing, I submit that there is probable cause to believe that, in using the fraudulent Victim 2 license in connection with each of the transactions and attempts described above, GRDZELISHVILI willfully, knowingly, and with the intent to obtain money by means of false or fraudulent pretenses engaged in a scheme to obtain a financial institution's money by means of false or fraudulent pretenses and the financial institution was federally insured, in violation of Title 18, United States Code, Section 1344.

24. Based on all of the foregoing, I submit that there is probable cause to believe that, in using the fraudulent Victim 2 license in connection with the crime of bank fraud, knowingly possessed, or used, without lawful authority, a means of identification of another, in violation of Title 18, United States Code, Section 1028A.

Respectfully Submitted,

Aaron Bates /by Paul G. Levenson  
AARON BATES  
Special Agent  
United States Secret Service

Subscribed and sworn to via telephone in accordance with  
Fed. R. Crim. P. 4.1 on November 3, 2023.

  
HONORABLE PAUL G. LEVENSON  
UNITED STATES MAGISTRATE JUDGE

